

Introduction

According to the requirements of 21 CFR 807.92, the following information provides sufficient detail to understand the basis for a determination of substantial equivalence

Submitter name, address, contact

Roche Diagnostics Corporation 9115 Hague Rd

Indianapolis IN 46250 (317) 521-3831

Contact person: Sherri L. Coenen

Date prepared: February 27, 2002

**Device Name** 

Proprietary name: ELECSYS® Anti-Tg Assay

Common name: Antibodies to thyroglobulin (Anti-Tg)

Classification name: Thyroid autoantibody immunological test system

Device description

The ELECSYS® Anti-Tg Assay a two step sandwich immunoassay with streptavidin microparticles and electrochemiluminescence detection.

Results are determined using a calibration curve that is generated specifically on each instrument by a 2-point calibration and a master curve provided with the reagent bar code.

Intended use	Immunoassay for the in vitro quantitative determination of antibodies to thyroglobulin in human serum and plasma.	
Indication for use	The Anti-Tg determination is used as an aid in the detection of autoimmune thyroid diseases.	
Substantial equivalence	The ELECSYS Anti-Tg test is equivalent to other devices legally marketed in the United States. We claim equivalence to the DPC Immulite 2000 Anti-TG AB (K991094).	

Substantial equivalence - similarities

The following table compares the ELECSYS® Anti-Tg, with the Predicate Devices.

Feature	New Device	Predicate Device
	ELECSYS Anti-Tg	Immulite 2000 Anti-TG Ab
Intended use	Immunoassay for the in vitro determination of antibodies to thyroglobulin in human serum and plasma. The anti-Tg determination is used as an aid in the detection of autoimmune thyroid diseases. The electrochemiluminescence immunoassay "ECLIA" is intended for use on the Roche Elecsys 1010/2010 and Modular Analytics E170	For in vitro diagnostic use with the Immulite 2000 analyzer – for the quantitative measurement of autoantibodies to thyroglobulin (TG) in serum EDTA and heparinized plasma, as an aid in the clinical diagnosis of thyroid diseases.
Sample type	immunoassay analyzers.  Human serum Human plasma treated with sodium heparin, or K <sub>2</sub> /K <sub>3</sub> - EDTA	human serum, EDTA, and heparinized plasma
Assay Protocol	competitive assay	immunometric assay
Detection Protocol	electrochemiluminescence immunoassay	chemiluminescence assay
Traceability	Calibrated against NIBSC 65/93 Standard	Calibrated against NIBSC 65/93 Standard

#### Substantial equivalence – differences

The following table compares the ELECSYS® Anti-Tg with the Predicate Device.

Feature	New Device ELECSYS Anti-Tg	Predicate Device Immulite 2000 Anti-TG Ab
Measuring range	10 – 4000 IU/ml	0 – 3000 IU/ml
Expected values	Up to 115 IU/ml (95 <sup>th</sup> percentile)	Nondetectable to 40 IU/ml (95 <sup>th</sup> percentile)
Instrument	ELECSYS® 2010, 1010, and Modular Analytics E170 Immunoassay Analyzers	Immulite 2000 Analyzer

# Substantial equivalence – performance characteristics

The performance characteristics of the ELECSYS Anti-Tg and the Predicate Device are compared in the table below.

Reproducibility was determined using Elecsys reagents, pooled human sera and commercial controls according to a modified protocol (EP5-A) of the NCCLS: five or six times daily for 10 days (n = 59 or 60); intra-assay precision on E170, n = 21. The following results were obtained:

Feature	New Device	Predicate Device
	ELECSYS Anti-Tg	Immulite 2000 Anti-TG Ab
Intra-assay	Human Serum	• 4.9% at 43 IU/ml
precision (%CV)	• 4.9% at 62.8 IU/ml	• 3.2% at 92 IU/ml
	• 5.1% at 115 IU/ml	• 3.5% at 205 IU/ml
	• 4.6% at 290 IU/ml	• 4.0% at 324 IU/ml
	• 5.6% at 2894 IU/ml	• 3.7% at 508 IU/ml
	Controls	• 3.9% at 736 IU/ml
	• 5.5% at 99.5 IU/ml	
	• 5.6% at 232 IU/ml	
Total precision	Human Serum	• 5.7% at 23 IU/ml
(%CV)	• 8.7% at 62.8 IU/ml	• 4.6% at 63 IU/ml
	• 7.2% at 115 IU/ml	• 5.0% at 201 IU/ml
	• 5.9% at 290 IU/ml	• 5.8% at 381 IU/ml
	• 6.3% at 2894 IU/ml	• 5.0% at 784 IU/ml
	Controls	• 5.7% at 1644 IU/ml
	• 7.2% at 99.5 IU/ml	
	• 6.7% at 232 IU/ml	

Substantial equivalence – performance characteristics, continued The performance characteristics of the ELECSYS anti-Tg and the Predicate Device are compared in the table below.

Feature	New Device	Predicate Device
}	ELECSYS Anti-Tg	Immulite 2000 Anti-TG Ab
Analytical	< 10 IU/ml	2.2 IU/ml
sensitivity		
Limitations	<ul> <li>No interference from</li> </ul>	No significant effect from
	icterus up to 66 mg/dL	bilirubin.
	No interference from	No significant effect from
	hemolysis up to 1.69 g/dL	hemolysis.
ļ ļ	No interference from	
	lipemia up to 2000 mg/dL	
	triglyceride	
	No interference from biotin	
	up to 60 ng/mL	
	No interference from	
	rheumatoid factor up to	
	300 U/mL	
On-board	• Elecsys® 2010 / E170: 6	N/A
stability	weeks	
	• Elecsys® 1010: 6 weeks	
	(stored alternately in	
	refrigerator and analyzer at	
	ambient temperature 20-25	
	C) Up to 20 hr. opened in	
<u></u>	total	<u> </u>

Substantial equivalence – performance characteristics, continued

The performance characteristics of the ELECSYS Anti-Tg and the Predicate Device are compared in the table below.

Feature	New Device	Predicate Device
	ELECSYS Anti-Tg	Immulite 2000 Anti-TG Ab
Calibration frequency	<ul> <li>Elecsys® 2010 / E170:</li> <li>Once per reagent lot</li> <li>after one month (using the same reagent lot)</li> <li>after 7 days (using the same reagent kit on the analyzer)</li> <li>Elecsys® 1010</li> <li>With every reagent kit</li> <li>after 7 days (using the same reagent kit, ambient temperature 20 - 25°C)</li> <li>after 3 days (using the same reagent kit, ambient temperature 25 - 32°C)</li> </ul>	Every 2 weeks
	• Controls out of range (both systems)	

# DEPARTMENT OF HEALTH & HUMAN SERVICES OF THE PROPERTY OF HEALTH & HUMAN SERVICES

Food and Drug Administration 2098 Gaither Road Rockville MD 20850

Ms. Sherri L. Coenen Regulatory Submissions, Centralized Diagnostics Roche Diagnostics Corporation 9115 Hague Road P.O. Box 50457 Indianapolis, Indiana 46250-0457

AUG 0 5 2002

Re: k020672

Trade/Device Name: ELECSYS® Anti-Tg Assay

Regulation Number: 21 CFR § 866.5870

Regulation Name: Thyroid Autoantibody Immunological Test System

Regulatory Class: II Product Code: JZO Dated: May 9, 2002 Received: May 13, 2002

#### Dear Ms. Coenen:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to such additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the <u>Federal Register</u>.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

This letter will allow you to begin marketing your device as described in your 510(k) premarket notification. The FDA finding of substantial equivalence of your device to a legally marketed predicate device results in a classification for your device and thus, permits your device to proceed to the market.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801 and additionally 809.10 for in vitro diagnostic devices), please contact the Office of Compliance at (301) 594-4588. Additionally, for questions on the promotion and advertising of your device, please contact the Office of Compliance at (301) 594-4639. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21CFR 807.97). Other general information on your responsibilities under the Act may be obtained from the Division of Small Manufacturers International and Consumer Assistance at its toll-free number (800) 638-2041 or (301) 443-6597 or at its internet address "http://www.fda.gov/cdrh/dsma/dsmamain.html".

Sincerely yours,

Steven I. Gutman, M.D., M.B.A.

Steven Butman

Director

Division of Clinical

Laboratory Devices

Office of Device Evaluation

Center for Devices and

Radiological Health

Enclosure

#### INDICATIONS FOR USE STATEMENT

510(k) Number (if known): N/A KODO672
Device Name: <u>ELECSYS® Anti-Tg Test System</u>
Indications For Use: Immunoassay for the in vitro quantitative determination of antibodies to thyroglobulin in human serum and plasma. The anti-Tg determination is used as an aid in the detection of autoimmune thyroid disease.
The electrochemiluminescence immunoassay "ECLIA" is intended for use on the Roche Elecsys® 1010 / 2010 and Modular Analytics E170 (Elecsys module) Immunoassay Analyzers.
(PLEASE DO NOT WRITE BELOW THIS LINE - CONTINUE ON ANOTHER PAGE IF NEEDED)
Concurrence of CDRH, Office of Device Evaluation (ODE)
Prescription Use OR Over-The-Counter Use (Per 21 CFR 801.109)
(Optional Format 1-2-96)

(Division Sign-Off)
Division of Clinical Laboratory Devices
510(k) Number (520 672